

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 02-30043-MAP
)
 MICHAEL QUICKEL,)
 Defendant.)

Motion to Reschedule Sentencing

(Assented To)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that the Court reschedule Michael Quickel's sentencing from March 30, 2006, to April 14, 2006, at 11:00am.

There are two reasons for this request. First, the government needs the additional two weeks for the Substantial Assistance Committee to make its final decision as to whether the government will file a 5K1.1 motion on Mr. Quickel's behalf. If that motion is made, it will be a substantial benefit for Mr. Quickel. Second, the U.S. Attorney's Office has mandatory appellate advocacy training for all Assistant U.S. Attorney's scheduled for March 30, 2006, at 1:30pm. The U.S. Attorney has instructed all prosecutors to request that District Judges permit the prosecutors who are scheduled to appear before them at that time to attend this training.

Mr. Quickel's counsel, Richard Maggi, Esq., has assented to this request.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

by: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Date: March 29, 2006

Certificate of Service

March 29, 2006

I certify that I caused the foregoing document to be mailed to counsel for the defendant, Richard Maggi, Esq.

/s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney